

THE HONORABLE BRIAN D. LYNCH
CHAPTER 13
LOCATION: Tacoma, Washington

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT TACOMA

In re:

CHARLES EDWARD MAYS JR and
DARLA JO MAYS,

Debtors.

Case No.: 17-43966-BDL

DECLARATION OF DANIELLE BERGER IN
SUPPORT OF MOTION TO DISMISS

I, Danielle Berger hereby declare that the following statements are true and correct to the best of my knowledge, and I am subject to penalty of perjury under the laws of the United States:

1. I am over the age of eighteen, a resident of the United States of America, and otherwise competent to provide the following testimony from my personal knowledge.
2. I am employed by Michael G. Malaier, Chapter 13 Trustee charged with administering the instant bankruptcy estate.
3. According to our records, Debtors have failed to make all payments as required by the plan.

4. As of today's date, the payment delinquency stands at \$10,800.00, pursuant to the below payment history:

Period	Date (Month/Year)	Payment Due	Payment Received	Amount Due
14	12/2018	\$3,600.00	\$1,800.00	\$1,800.00
15	1/2019	\$3,600.00	\$3,600.00	\$1,800.00
16	2/2019	\$3,600.00	\$1,800.00	\$3,600.00
17	3/2019	\$3,600.00		\$7,200.00
18	4/2019	\$3,600.00	\$3,600.00	\$7,200.00
19	5/2019	\$3,600.00		\$10,800.00

5. Debtors have not provided Trustee with a copy of the 2017 or 2018 tax returns. Debtors and Debtors' attorney have received letters and emails requesting the 2017 and 2018 tax returns.
6. I will provide any further information required by the Court to assist in its adjudication of the issues presented in the Motion to Dismiss.

EXECUTED at Tacoma, Washington this 28th day of May, 2019.

/s/Danielle Berger

Danielle Berger, Case Administrator for
Michael G. Malaier, Chapter 13 Standing Trustee